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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION TO LODGE
MATERIALS UNDER SEAL**

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3 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(b),
4 and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on February
5 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis
6 Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated
7 (collectively, "Plaintiffs") hereby move this Court for leave to lodge certain documents under seal
8 related to their motion to challenge Defendant's assertion of work product protection over three
9 certain documents.

10 Plaintiffs request leave to lodge certain documents under seal. First, Plaintiffs seek leave to
11 lodge under seal Plaintiffs' Motion To Challenge Work Product Designation.

12 Second, Plaintiffs seek leave to lodge under seal Exhibit 1 to the Declaration of Kevin E.
13 Rayhill In Support Of Plaintiffs' Motion To Challenge Work Product Designation (the "Rayhill
14 Declaration"), which is an unredacted version of a document with the Bates number ZFL-1824837,
15 an attachment to the email consisting of a memorandum drafted by the third party human resources
16 consulting firm requesting documents, that Defendant has clawed back as protected under the work
17 product doctrine.

18 Third, Plaintiffs seek leave to lodge under seal Exhibit 2 to the Rayhill Declaration, which is
19 an unredacted version of a document with the Bates number ZFL-1824835, an email between
20 Zuffa's in-house counsel and outside counsel scheduling a phone call.

21 Fourth, Plaintiffs seek leave to lodge under seal Exhibit 3 to the Rayhill Declaration, which is
22 an unredacted version of a document with the Bates number ZFL-0557588, a presentation prepared
23 by a third party human resources consulting firm commissioned by Defendant.

24 Exhibits 1, 2 and 3 are the three documents at issue in Plaintiffs' motion to challenge.

25 Fifth, Plaintiffs seek leave to lodge under seal Exhibit 5 to the Rayhill Declaration which is a
26 document with the Bates stamp ZFL-1007379, consisting of a letter dated August 8, 2013 from the
27 third party human resources consulting firm to Lorenzo Fertitta with the subject line "Statement of
28 Work ("SOW") - Fighter Pay Program Review and Design."

Sixth, Plaintiffs seek leave to lodge under seal Exhibit 7 to the Rayhill Declaration which is an unredacted copy of Plaintiffs Notice of Deposition of Defendant Zuffa, LLC Pursuant to Federal Rule of Civil Procedure 30(b)(6), which contains a reference to the content of ZFL-1007379, the Mercer Statement Of Work (Ex. 5), which has been designated CONFIDENTIAL by Defendant.

Seventh, Plaintiffs seek leave to lodge under seal Exhibit 9 to the Rayhill Declaration which is an unredacted copy of Plaintiffs' Second Requests For Production of Documents, which contain a reference to the content of ZFL-1007379, the Mercer Statement Of Work (Ex. 5), which has been designated CONFIDENTIAL by Defendant.

Plaintiffs have filed all of these documents, in accordance with the Court's ECF system, with the instant motion. Plaintiffs have filed placeholders for these documents with the Court, and will serve un-redacted versions of these documents on Defendant.

DATED this 31st day of August, 2016

JOSEPH SAVERI LAW FIRM, INC.

By: /s/ Joseph R. Saveri

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2016 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via the
United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Kevin E. Rayhill